



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

NOV 1 1988

Robert J. Dieter
Redfern, McKinley, Mason & Dieter
Attorneys at Law
315 Clay Street
P.O. Box 627
Cedar Falls, Iowa 50613

Re: Coffman and Big Woods Auto

Dear Mr. Dieter:

Thank you for sending the Sampling and Analysis Plan for the Big Woods Auto and Coffman facilities. The Agency has reviewed your plan and enclosed you will find a one page list of our concerns regarding this plan.

In general, the Agency is disappointed with your proposed plan. It lacks many fundamental aspects of a typical sampling and analysis plan, for example, a facility map, sampling methodology and chain of custody procedures. Please review the enclosed comments to improve your plan.

As we have indicated in past discussions, the Agency will not approve or disapprove your preliminary sampling plan. If preliminary sampling is implemented at the Coffman and Big Woods facilities, you should adopt these revisions before implementation. You may send the Agency a copy of your revised plan.

The Agency has advised you that some additional sample collection and analyses may be required at these facilities in accordance with an approved Closure Plan. A sampling and analysis plan is necessarily included in Closure Plans according to federal regulations, 40 C.F.R. Section 265.112. As you recall, the Compliance Order issued on March 30, 1988, requires that a Closure Plan shall be submitted for Agency approval and for implementation at these facilities.

Please be advised that your comments on the draft Consent Agreement and Consent Order of July 15, 1988, are being considered by the Agency. We will contact you soon with our

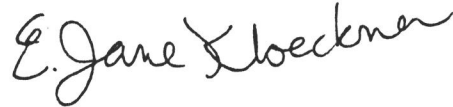


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concerns regarding such revisions. Also, we received your letter of October 10, 1988, regarding the availability of Pollution Liability insurance for these facilities.

Thank you for your continued cooperation in this matter. Should you have any questions or comments, please contact the undersigned at (913) 236-2809.

Sincerely yours,

A handwritten signature in cursive script that reads "E. Jane Kloeckner".

E. Jane Kloeckner
Assistant Regional Counsel

Enclosure

cc: ✓ Beth Koesterer, RCRA

COFFMAN/CUNNINGHAM SAMPLING AND ANALYSIS PLAN

October 13, 1988

In general, the plan, which consists of one page, does not provide sufficient detail to allow for evaluation of the proposal. A revised plan may be submitted which addresses the following comments.

1. A revised plan must, in order to be adequate, include:

(a.) A facility map, which is either to scale or which includes dimensions, indicating as accurately as possible the proposed sample collection sites;

(b.) A detailed description of the areas including the type and thickness of base construction such as asphalt, concrete, gravel, dirt, etc.

2. The plan must be revised to include justification for the selection of the proposed sampling locations.

3. The plan must be revised to include the specific methodology to be used in obtaining the soil samples.

4. The plan must be revised to specify the techniques of sample preservation to be used in the field. The EPA Publication "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", SW-846, requires that samples containing volatile organics in a soil matrix be preserved at four degrees Celsius.

5. The plan must be revised to specify that the holding times specified in the EPA Publication SW-846 will be met. For volatile organics in a soil matrix, the holding time should not exceed fourteen days.

6. The plan must be revised to specify the type of sample container to be used.

7. The plan must be revised to include a more complete and site-specific description of the procedures which will be used to decontaminate the sampling equipment between soil borings.

8. The plan must be revised to include a requirement that non-foaming surfactants will be used in decontamination activities. The use of foaming agents can result in an unacceptably significant increase in the quantitation limit during subsequent laboratory analysis.

9. The plan must be revised to include a sample chain-of-custody form.

10. The plan must be revised to include a schedule of sampling activities including an estimated delivery date for the final report.